



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

October 6, 2021

**VIA ECF**

Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: *United States v. Schulte*,  
S3 17 Cr. 548 (PAC)**

Dear Judge Crotty:

The Government respectfully submits this status letter with respect to the Court's orders dated September 23, 2021 concerning discovery and the defendant's mail. (D.E. 513 & 515).

*Discovery.* With respect to the defendant's discovery copy of the SC01 Desktop and SRV02 Server, those discovery materials were produced in discovery in early 2018 and previously maintained on a single hard drive stored in a safe in the courthouse SCIF. Early last year, the safe in which this hard drive was stored failed, which can be a consequence of long-standing disuse. Since that time, the Court Information Security Office maintained custody of the hard drive. Access to the drive was never requested until the defendant's motion to compel. Last week, a replacement safe was installed in the SCIF to store the hard drive.

Before the discovery hard drive is returned to the SCIF, discovery stored on that drive other than the SC01 Desktop will be copied to a second hard drive. This is because the SC01 Desktop contains depictions of child pornography and, accordingly, can only be reviewed with certain restrictions: it must be retrieved from the safe by Government personnel and can be reviewed by the defendant only on a special-purpose computer in the presence of Government personnel. In order to allow the defendant freer access to other discovery that is currently stored on the hard drive along with the SC01 Desktop, that other discovery (including discovery from SRV02) will be duplicated onto a separate hard drive that, although it must remain in the SCIF, need not be stored in the same safe nor handled subject to the restrictions applicable to the SC01 Desktop containing child pornography.

*Defendant's mail.* The Court ordered a status update with respect to mailings to the defendant concerning this case that do not originate from the Government. (D.E. 515 at 2-3). As noted in the Government's opposition to the defendant's motion and the Court's order,

cc: Standby counsel (by ECF)  
Joshua Adam Schulte (by hand via BOP Legal Department)